

REMARKS/ARGUMENTS

In view of the following discussion, the Applicants submit that none of the claims now pending in the application fail to comply with 35 USC § 112 first paragraph or are obvious under the provisions of 35 USC § 103 (a). Thus, the Applicants believe that all of these claims are now in allowable form.

If, however, the Examiner believes that there are any unresolved issues resulting in adverse action in any of the claims now pending in the application, Applicants respectfully request that the Examiner telephone Ms. Janet M. Skafar, Esq. at telephone number (650) 988-0655 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Status of Claims

Claims 1-13, 24-27, 29-32, 39-45, 48, 50, 52-58 are pending in this application. Claims 14-23, 28, 33-38, 46, 47, 49 and 51 are canceled.

In the Claims

Claims 1, 6, 7, 24, 27, 29, 32, 45, 48, 50, 52 and 58 are amended to change "said" to "the" for consistency.

The Rejection of Claims 1-13, 24-27, 29-32, 39-45, 48 and 50 Under 35 USC § 112, 1st Paragraph

Claims 1-13, 24-27, 29-32, 39-45, 48 and 50 are rejected under 35 USC § 112, first paragraph, as failing to comply with the enablement requirement.

Claims 1-13 and 48

Per MPEP section 2164, the enablement requirement refers to the requirement of 35 U.S.C. 112, first paragraph that the specification describe how to make and how to use the invention. **The invention that one skilled in the art must be enabled to make and use is that defined by the claim(s)** of the particular application.

In section 5, the non-final rejection of 09/19/2008 asserts that on page 5 of applicant's specification, the components of the software system "... comprises four modules ..." that can be used to create various structures or complete tasks. In response, Applicants respectfully point out that none of Claims 1-13 uses the term "module." Because Claims 1-13 do not use the term "module", Applicants respectfully maintain that asserting that the specification teaches that the components of the software system "... comprises four modules ..." does not establish a reasonable basis to question the enablement of Claims 1-13.

The rejection asserts that there are inconsistencies in the nodes exact definition. Applicants respectfully point out that Claims 1-5, 7, 10-13 and 48 do not recite "node" or "nodes". Because Claims 1-5, 7, 10-13 and 48 do not recite "node" or "nodes", Applicants respectfully maintain that the Examiner has not established a reasonable basis to question the enablement of Claims 1-5, 7, 10-13, and 48 based on the terms "node" or "nodes".

In section 5, the non-final rejection of 09/19/2008 asks how all these parts or "components" of the system function together. The rejection asserts that the specification merely discloses descriptions of the various parts or "components" but it fails to disclose how the nodes, workflow systems, etc., work together to accomplish real-time delivery from disparate content repositories.

Per MPEP section 2164, **the invention that one skilled in the art must be enabled to make and use is that defined by the claim(s)** of the particular application. Claims 1-3, 5-13 and 48 do not use the terminology of "components". Claims 1 and 48 recite interrelationships between various claimed elements, such as workflow systems. Claims 1 and 48 do not recite "nodes". Claim 4 recites "Component Object Model" and "Web Development Components" in the context of the API.

Applicants respectfully maintain that support for Claims 1-13 and 48 can be found in Figure 1, page 3 lines 13-20, page 5 line 19 to page 6 line 9, and page 6 line 10 to page 8 line 13 of Applicants' specification. Therefore Applicants respectfully maintain that the Examiner has not established a reasonable basis to question the enablement of Claims 1-5, 7, 10-13, and 48 based on the term "component".

Claims 1, 4 and 48 recite an API. The rejection asserts that although the specification gives examples of what the API does, it never clearly defines the API. However, in the Response to Arguments section on page 36 of the rejection of March 31, 2008, the Examiner admitted that the Applicants have defined an API in the specification. Applicants respectfully maintain that the asserted examples of what the API does, indicates that the specification enables an API. Furthermore, page 3 lines 13-20 and page 5, line 19 to page 6 line 4 of Applicants' specification supports the API of Claims 1, 4 and 48. Therefore, the Applicants respectfully maintain that the API of Claims 1, 4 and 48 is defined and is enabled.

For the foregoing reasons, Applicants respectfully maintain that Claims 1, 2-5, 7, 10-13 and 48 comply with the enablement requirement.

Claim 6 depends from Claim 1. Claim 6 recites: wherein said at least one virtual folder is at least one node, respectively, and the first, second, third, fourth, fifth, sixth, seventh and eighth links are also nodes thereby providing a plurality of nodes of the virtual repository, wherein the plurality of nodes are arranged in a parent-child hierarchy. Applicants respectfully maintain that the use of the terms "node", "nodes" and "plurality of nodes" in Claim 6 is enabled because a node that is a link and a node that is a virtual folder are specifically recited and support can be found on page 7 lines 1-9 of the specification. Claim 6 does not use the terms "node", "nodes" and "plurality of nodes" in an inconsistent manner. Therefore, Applicants respectfully maintain that Claim 6 is enabled.

Claim 8 uses the term "nodes" as follows: wherein the first, second, third, fourth, fifth, sixth, seventh and eighth links are nodes. Claim 8 does not use the term "nodes" in an inconsistent manner. Applicants respectfully maintain that the use of the term "nodes" in Claim 8 is enabled based on page 7 lines 1-9 of the specification. Therefore, Applicants respectfully maintain that Claim 8 is enabled.

Claim 9 uses the term "nodes" as follows: wherein the first, second, third, fourth, fifth, sixth, seventh and eighth links are nodes of the virtual repository. Applicants respectfully maintain that the use of the term "nodes" in Claim 9 is enabled based on page 7 lines 1-9 of the specification, and that Claim 9 does not use the term "nodes" in an inconsistent manner. Therefore, Applicants respectfully maintain that Claim 9 is enabled.

For the foregoing reasons, Applicants respectfully maintain that Claims 1-13 and 48 comply with the enablement requirement.

Claims 24-27, 29-32 and 50

In section 5, the non-final rejection of 09/19/2008 asserts that on page 5 of applicant's specification, the components of the software system "... comprises four modules ..." that can be used to create various structures or complete tasks. However, none of Claims 24-27, 29-32 and 50 uses the term "module." Because Claims 24-27, 29-32 and 50 do not use the term "module", Applicants respectfully maintain that asserting that the specification teaches that the components of the software system "... comprises four modules ..." does not establish a reasonable basis to question the enablement of Claims 24-27, 29-32 and 50.

Claims 24, 27, 29-31 and 50 use the terms: "nodes" and "nodes". The rejection asserts that there are inconsistencies in the nodes exact definition, and that the Examiner is not sure if the node is an actual entity/content or just a link to the content. However, independent Claims 24 and 50 describe the node being claimed. For example, Claim 24 recites: a first node of the plurality of nodes representing a first work item of a first queue of the first workflow system. Even assuming that the first work item itself is a type of node, what is claimed is clear - a first node of the plurality of nodes representing a first work item of a first queue of the first workflow system. Therefore, Applicants respectfully maintain that the use of the terms "node" and "nodes" in Claims 24 and 50 consistent and clear, and Claims 24 and 50 are enabled. Claims 27 and 29-31 depend from Claim 24 and refer to the nodes of Claim 24. Therefore, Applicants respectfully maintain that the use of "node" and "nodes" in Claims 27 and 29-31 is consistent and clear, and enabled.

Claims 24, 25 and 50 recite an API. The rejection indicated that although the specification gives examples of what the API does, it never clearly defines the API. Yet, in the Response to Arguments section on page 36 of the rejection of March 31, 2008, the Examiner admitted that the Applicant has defined an API in the specification. Applicants respectfully maintain that the asserted example of what the API does, indicates that the specification enables the API of Claims 24, 25 and 50. Furthermore, page 4 lines 4-11, page 5 line 19 to page 6 line 4, and page 12 lines 8-12 of Applicants' specification provides support for the API of Claims 24, 25 and 50. Therefore, the Applicants respectfully maintain that the API of Claims 24, 25 and 50 is enabled.

In section 5, the non-final rejection of 09/19/2008 asks how all these parts or "components" of the system function together. The rejection asserts that the specification merely discloses descriptions of the various parts or "components" but it fails to disclose how the nodes, workflow systems, etc., work together to accomplish real-time delivery from disparate content repositories.

Per MPEP section 2164, **the invention that one skilled in the art must be enabled to make and use is that defined by the claim(s)** of the particular application. Claims 24, 26-27, 29-32 and 50 do not recite "component". Claims 24 and 50 recite interrelationships between various claimed elements, such as workflow systems and nodes. Claim 25 recites "Component Object Model" and "Web Development Components" in the context of the API. Applicants respectfully maintain that support for Claims 24-27, 29-32 and 50 can be found in Figure 3; page 4 lines 4-11; page 5 line 21 to page 6 line 9; and page 12 line 5 to page 15 line 21 of Applicants' specification. Therefore Applicants respectfully maintain that Claims 24-27, 29-32 and 50 are enabled.

For the foregoing reasons, Applicants respectfully maintain that Claims 24-27, 29-32 and 50 comply with the enablement requirement.

Claims 39-45

In section 5, the non-final rejection of 09/19/2008 asserts that on page 5 of applicant's specification, the components of the software system "... comprises four modules ..." that can be used to create various structures or complete tasks. However, none of Claims 39-45 uses the term "module." Because Claims 39-45 do not use the term "module", Applicants respectfully maintain that asserting that the specification teaches that the components of the software system "... comprises four modules ..." does not establish a reasonable basis to question the enablement of Claims 39-45.

The rejection asserts that there are inconsistencies in the nodes exact definition. Applicants respectfully point out that Claims 39-45 do not use the terms "node" and "nodes". Because Claims 39-45 do not use the terminology of "node" or "nodes", Applicants respectfully maintain that the Examiner has not established a

reasonable basis to question the enablement of Claims 39-45 based on the use of the terms "node" or "nodes".

In section 5 of the non-final rejection of 09/19/2008, the rejection asks how all these parts or "components" of the system function together. The rejection asserts that the specification merely discloses descriptions of the various parts or "components" but it fails to disclose how the nodes, workflow systems, etc., work together to accomplish real-time delivery from disparate content repositories.

Per MPEP section 2164, **the invention that one skilled in the art must be enabled to make and use is that defined by the claim(s)** of the particular application. Claims 39-45 do not use the terminology of "components". Independent Claim 39 recites interrelationships between various claimed elements, such as a first workflow system and a second workflow system. Support for Claims 39-45 can be found in Figures 4 and 5, and page 4 lines 12 to page 5 line 2, page 5 line 21 to page 6 line 9, and page 15 line 22 to page 20 line 17. Therefore, Applicants respectfully maintain that Claims 39-45 are enabled.

Claims 39 and 44 recite an API. The rejection in the Non-Final Office Action of September 19, 2008 indicates that although the specification gives examples of what the API does, it never clearly defines the API. Yet, in the Response to Arguments section on page 36 of the rejection of March 31, 2008, the Examiner admitted that the Applicants have defined an API in the specification. Applicants respectfully maintain that the asserted example of what the API does, indicates that the specification enables the API of Claims 39 and 44. Furthermore, page 4 lines 12-19, page 5 line 19 to page 6 line 4, and page 17 lines 9-11 of Applicants' specification provides support for the API of Claims 39 and 44. Therefore, the Applicants respectfully maintain that the API of Claims 39 and 44 is defined and enabled.

For the foregoing reasons, Applicants respectfully maintain that Claims 39-45 comply with the enablement requirement.

Claims 52-58

Applicants respectfully point out that Claims 52-58 were **not** rejected under 35 USC § 112, first paragraph, as failing to comply with the enablement requirement.

The Rejection of Claims 1-9, 11 and 48 Under 35 USC § 103(a)

Claims 1-9, 11 and 48 are rejected under 35 USC § 103(a) as being obvious over Flores et al (U.S. Pat. No. 5734837) in view of Hobbs (U.S. Pat. No. 6523022). Applicants respectfully disagree.

Applicants respectfully maintain that the combination of Flores et al and Hobbs does not teach each and every recitation of Claims 1 and 48.

In column 20 lines 17-23, Hobbs teaches that HTML code sent to the client specifies text, audio, graphics or video files (or documents) or some combination thereof, to be pulled in from other directories on the Application Server, and/or from other remote servers across the Internet or within an intranet, and into predetermined nested frames on the client application. Hobbs is directed to pulling in content from directories, but not virtually organizing the directories.

Hobbs does not teach at least one virtual folder virtually organizing a first folder of the first content repository, and a second folder of a second content repository via a plurality of links, a seventh link being to the first folder and the eighth link being to the second folder, wherein the first folder is accessed via the seventh link and the API, and the second folder is accessed via the eighth link and the API.

Flores et al mentions a queue in col. 4 line 64. Neither Flores nor Hobbs teaches a link to a queue. Neither Flores et al nor Hobbs teaches virtually organizing a queue of a workflow system.

Therefore, Applicants respectfully maintain that the combination of Flores et al and Hobbs does not teach each and every recitation of Claims 1 and 48. For the foregoing reasons, Applicants respectfully maintain that Claims 1 and 48 are not obvious. Claims 2-9 and 11 depend from Claim 1 and are not obvious for the same reasons as Claim 1.

The Rejection of Claims 24-31 and 50 Under 35 USC § 103(a)

Claims 24-27, 29-31 and 50 are rejected under 35 USC § 103(a) as being as being obvious over Flores et al. (U.S. Pat. No. 5734837) in view of Hobbs (U.S. Pat. No. 6523022). Applicants respectfully disagree.

Applicants point out that Claim 28 has been canceled.

Applicants respectfully maintain that the combination of Flores et al and Hobbs does not teach each and every recitation of Claims 24 and 50.

In column 20 lines 17-23, Hobbs teaches that HTML code sent to the client specifies text, audio, graphics or video files (or documents) or some combination thereof, to be pulled in from other directories on the Application Server, and/or from other remote servers across the Internet or within an intranet, and into predetermined nested frames on the client application. Hobbs is directed to pulling in content from directories.

Hobbs does not teach a seventh node representing a first folder of the first content repository, and an eighth node representing a second folder of the second content repository. Hobbs does not teach that the seventh and eighth nodes are members of at least one association.

Flores et al mentions a queue in col. 4 line 64. Neither Flores et al nor Hobbs teaches a third node representing a first queue of the first workflow system, and a fourth node representing a second queue of the second workflow system. Neither Flores et al nor Hobbs teaches that the third node and the fourth node are members of at least one association. Neither Flores et al nor Hobbs teaches locators to the first and second queues, and to the first and second folders.

Therefore the combination of Flores et al and Hobbs does not teach each and every recitation of Claims 24 and 50. For the foregoing reasons, Claims 24 and 50 are not obvious. Claims 25-27, 29-31 and 50 depend from Claim 24 and are not obvious for the same reasons as Claim 24.

The Rejection of Claims 12-13 Under 35 USC § 103(a)

Claims 12-13 are rejected under 35 USC § 103(a) as being obvious over Flores et al in view of Hobbs and in view of Michaelides (U.S. Pub. No. 2004/0181753). Applicants respectfully disagree.

Claims 12-13 depend from Claim 1. As discussed above, the combination of Flores et al and Hobbs does not teach all the recitations of Claim 1. Furthermore, Michaelides does not teach a virtual repository comprising at least one virtual folder organizing queues and folders. There is no teaching of a link to a folder in Michaelides. Furthermore, Michaelides does not teach first and second workflow systems. In addition,

Michaelides does not teach a link to a work item and link to a queue of a workflow system.

Therefore, Applicants respectfully maintain that neither Flores et al nor Hobbs nor Michaelides, alone or in combination, teach all the recitations of Claim 1, and therefore Claims 12-13. For the foregoing reasons, Applicants respectfully maintain that Claims 1, 12 and 13 are not obvious and are patentable.

The Rejection of Claims 32 and 58 Under 35 USC § 103(a)

Claims 32 and 58 are rejected under 35 USC § 103(a) as being obvious over Flores et al. in view of Hobbs and in view of Brunner (U.S. Pat. No. 5550971). Applicants respectfully disagree.

Claims 32 and 58 depend from Claim 24. As discussed above, the combination of Flores et al and Hobbs does not teach all the recitations of Claim 24.

Although Brunner uses the term "ASSOCIATION type", Brunner does not teach each and every recitation of Claim 32 of: wherein the associations have 0 or more association types, wherein the association types have logical properties describing the type of the relationship, wherein said logical properties comprise at least one of: an allowed cardinality of the relationship, allowed members of the relationship, required members of the relationship, a transitivity of the relationship, a delete propagation across the relationship, and a save propagation across the relationship.

Brunner is directed to a method and system for generating a user interface in a database management system. A semantic data model is used to describe a database in terms of data types stored in the database and functional types that describe relationships between the data types stored in the database.

Brunner operates at the database level. In contrast, the invention of Claims 24, 32 and 58 operates at a level that is higher than the database level. The invention of Claims 24, 32 and 58 is directed to creating rich relationships between content, folders, work items and queues that exist in a plurality of content repositories, a plurality of workflow systems and at least one other external information source.

Claim 58 has additional distinguishing recitations not taught by Brunner. Although Brunner uses the term "ASSOCIATION type", Brunner does not teach each and every recitation of Claim 58 of: wherein the associations have association types, wherein the association types have logical properties describing the type of the relationship, wherein said **logical properties comprise** an allowed **cardinality** of the relationship, a **allowed members** of the relationship, **required members** of the relationship, a **transitivity** of the relationship, a **delete propagation** across the relationship, **and a save propagation** across the relationship. In particular, Brunner does not teach delete propagation or a save propagation across the relationship.

Therefore, Applicants respectfully maintain that neither Flores et al nor Hobbs nor Brunner, alone or in combination, teaches all the recitations of Claims 32 and 58. For the foregoing reasons, Applicants respectfully maintain that Claims 32 and 58 are not obvious and are patentable.

The Rejection of Claims 39-44 and 52-57 Under 35 USC § 103(a)

Claims 39-44 and 52-57 are rejected under 35 USC § 103(a) as being obvious over Flores in view of Hobbs and in view of Armstrong (U.S. Pat. No. 6279046). Applicants respectfully disagree.

Applicants respectfully maintain that neither Flores et al, nor Hobbs nor Armstrong teach, alone or in combination, all the recitations of Claims 39 and 57.

In col. 5, lines 36-39 Hobbs teaches allowing users to subscribe to web pages as they browse; and once a subscriber, the user will automatically receive via e-mail any updates to the web pages to which the user subscribed. Thus Hobbs teaches subscribing to updates to in content, such as a web page.

In column 20 lines 17-23, Hobbs teaches that HTML code sent to the client specifies text, audio, graphics or video files (or documents) or some combination thereof, to be pulled in from other directories on the Application Server, and/or from other remote servers across the Internet or within an intranet, and into predetermined nested frames on the client application. Hobbs teaches pulling in content from directories.

Hobbs does not teach subscribing to changes to directories.

Flores et al mentions a queue in col. 4 line 64. Neither Flores et al nor Hobbs teaches subscriptions to changes in folders and queues. Neither Flores et al nor Hobbs teaches that the plurality of subscriptions are requests to track when at least one of an addition, change and delete occurs to any of the subscribed-to-items, respectively, the subscribed-to-items comprising the first content, the first folder, the first work item, the first queue, the second content, the second folder, the second work item and the second queue.

Armstrong does not disclose the subscriptions of the Claims 39 and 57. Armstrong is directed to event-driven communication within a single physical computer system. Armstrong teaches events between logical partitions in a single computer system. Armstrong does not teach events based on changes in the content and folders of content repositories and work items and queues of workflow systems.

Furthermore Armstrong does not teach a filter that filters interesting and uninteresting changes in events based on changes in content repositories and workflow system.

Armstrong does not teach: an event path defined per a logical group comprising a timer, a subscription group processor that creates events based on the plurality of subscriptions in response to the timer, a content monitor that detects change in the first content, first folder, second content, second folder, first work item, first queue, second work item, and second queue based on the events, an event filter that filters uninteresting change and interesting change based on the change detected by the content monitor, and an event handler that receives the interesting change, wherein the event handler logs the interesting change.

Thus, the combination of Hobbs and Armstrong does not teach all the recitations of Claims 39 and 57, and Claims 39 and 57 are patentable.

Applicants respectfully maintain that Armstrong is non-analogous art. Armstrong is directed to a different problem from Claims 39 and 57. Claims 39 and 57 are directed to providing notification of one or more event handlers when additions, changes or deletions occur to any subscribed to content, folders, work items and queues of content repositories and workflow systems. In contrast, Armstrong is directed to an event-driven communications interface to support communications between multiple logical partitions in a logically-partitioned computer. With logical partitioning, a single physical computer is permitted to operate essentially like multiple and independent "virtual" computers (referred to as logical partitions), with the various resources of the physical computer. Each logical partition executes a separate operating system. A shared resource, often referred to as a "hypervisor" or partition manager, manages the logical partitions and facilitates the allocation of resources to different logical partitions. Passage

of events between logical partitions typically occurs completely through the internal hardware components of the computer, and usually with relatively little overhead, thereby providing performance that is superior to the use of external networks.

Therefore one skilled in the art would not look to Armstrong to provide notification of event handlers based on change to content and folders of content repositories, and based on change to work items and queues of workflow systems.

For the foregoing reasons, Applicants respectfully maintain that Claims 39 and 57 are not obvious and are patentable. Claims 40-44 and 52-56 depend from Claim 39 and are patentable for the same reasons as Claim 39.

The Rejection of Claim 45 Under 35 USC § 103(a)

Claim 45 is rejected under 35 USC § 103(a) as being obvious over Flores et al in view of Hobbs in view of Armstrong (U.S. Pat. No. 6279046) in view of Zintel (U.S. PG. Pub. No. 2002/0029256) and further in view of Mobley (U.S. Pat. No. 5708963). Applicants respectfully disagree.

Claim 45 depends from Claim 39. As discussed above, neither Flores et al nor Hobbs nor Armstrong teaches, alone or in combination, each and every recitation of Claim 39. Furthermore the combination of Flores et al, Hobbs, Armstrong, Zintel and Mobley does not teach all the recitations of Claim 39, and therefore Claim 45.

Applicants respectfully maintain that Mobley is non-analogous art. One skilled in the art would not look to Mobley or Zintel to solve the problem of the claimed invention. Mobley is directed to an apparatus for using a low earth orbit satellite for reverse path communication in a subscription information service delivery system. Zintel publication is directed to a universal plug and play device. One skilled in the art would

not look to Mobley or Zintel to provide subscriptions to content and content organizing structures in content repositories and to work items and work organizing structures in workflow systems.

In addition, the classification of Applicants' application is 707/4 - data processing: database and file management or data structures-query formulation, input preparation, or translation. The classification of Mobley is 455/12.1; 455/3.2, 455/4.1 and 455/5.1. Class 455 is telecommunications. Class 455/12.1 is Space satellite. One skilled in the art would not look to telecommunications and in particular space satellites to address the problem of providing subscriptions to content and content organizing structures in content repositories and to work items and work organizing structures in workflow systems.

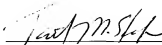
For the foregoing reasons, Applicants respectfully maintain that Claim 45 is not obvious and is patentable.

Conclusion

Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

Respectfully submitted,

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